



V.U.S.A. LAW OFFICES, APC  
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**Attorney for Defendant  
EVERGREEN JOINT VENTURES, LLC**

THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

|   |            |  |
|---|------------|--|
| <b>GEORGE AVALOS,</b>                         | Plaintiff  | ) <b>CASE NO. 1:20-CV-01546-AWI-SAB</b>  |
|   |            | )  |
|   |            | ) <b>DEFENDANT'S INITIAL DISCLOSURES</b> |
|   |            | ) <b>PURSUANT TO FRCP 26</b>             |
| <b>Versus</b>                                 |            | )  |
|   |            | )  |
| <b>EVERGREEN JOINT VENTURES, LLC, ET AL.,</b> | Defendants | )  |
|   |            | )  |

In accordance with Federal Rule of Civil Procedure 26(a)(1), Defendant EVERGREEN JOINT VENTURES, LLC, makes its initial disclosures as follows.

Defendant makeS these initial disclosures based on information reasonably available at the time of making of said disclosures. Defendant continueS to investigate this case and reserve the right to modify, amend, or supplement these disclosures at a later time as appropriate. Additionally, Defendant's disclosure is made without or in any way waiving the following rights: (1) the right to object on the grounds of competency, privilege, the work-product doctrine, undue burden, relevancy and materiality, hearsay, or any other proper grounds; (2) the right to object to the use of such information, for any purpose, in whole or in part, in any subsequent proceeding in this action or any other action; and (3) the right to object on any and all grounds, at any time, to any other discovery

1 request or proceeding involving or relating to the subject matter of the disclosure.

2       **A. NAME, ADDRESS, TELEPHONE NUMBER OF INDIVIDUALS LIKELY TO**  
3 **HAVE DISCOVERABLE INFORMATION; SUBJECT OF INFORMATION:**

4       1.     **Tony Dinh**

5              1835 Ashlan Avenue

6              Clovis, CA 93611

7              Telephone: (408) 590-2774

8              SUBJECT: Ownership of real property; condition of building and exterior area  
9              of the building and parking lot.

10          Discovery is pending and may further reveal additional individuals having discoverable  
11          information that are relevant to the issues presented in this matter. Defendant will identify these  
12          individuals, if any, in accordance with their obligations under F.R.C.P. 26(e).

13       **B. DESCRIPTION BY CATEGORY AND LOCATION OF ALL DOCUMENTS,**  
14 **ELECTRONICALLY STORED INFORMATION AND TANGIBLE THINGS IN SUPPORT**  
15 **OF DEFENDANTS' DEFENSES:**

16          Discovery is pending and may further reveal additional documents and tangible things that  
17          Defendant may rely upon to support their claims or defenses, and Defendant will make available these  
18          items, if any, in accordance with their obligations under F.R.C.P. 26(e).

19       **C. DAMAGES:**

20          Defendant does not know the full extent of Plaintiff's actual damages in this action and has not  
21          reviewed or inspected any documents or tangible things to ascertain such alleged damages.

22          Defendant believes that Plaintiff's action is without merit and is fabricated to further his pursuit  
23          of damages against Defendant and its principal and employee.

24       **D. LIABILITY INSURANCE:**

25          Defendant does not believe that they have any insurance policy in existence relevant to the time  
26          period during which this action is based.

1           Defendant reserves the right to supplement and/or correct these initial disclosures as discovery  
2 may reveal.

3           Per the requirements of F.R.C.P. 26(g)(1), the undersigned, by his signature herebelow,  
4 certifies to the best of his knowledge, information and belief, which is formed after a reasonable  
5 inquiry, that the disclosure as stated herein is complete and correct as of the time it is made.  
6

7           Dated: December 04, 2020

**V.U.S.A. LAW OFFICES, APC**

9           /s/ Michael Chinh Vu  
10           Michael Chinh Vu, Esq.  
11           Attorney for Defendant